

MICHAEL FAILLACE & ASSOCIATES, P.C.
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
GERARDO FLORES, *individually and on behalf of
others similarly situated,*

12 CV 3176 (RWS)

Plaintiff,

-against-

**[Proposed Form Of]
JUDGMENT**

KAI WON INC. (d/b/a KAR WON),
JIAN WU and JOHNSTON WU,

Defendants.

-----X

JUDGMENT

On April 23, 2012, this action was commenced by Plaintiffs' filing of the complaint and this Court's issuance of the summons. The summons and complaint in this action having been duly served on the above-named Defendants Kai Won Inc. (d/b/a Kar Won), Jian Wu and Johnston Wu, and said Defendants having failed to plead or otherwise defend in this action, and said default having been duly noted on January 11, 2013, and upon the annexed declaration of default judgment.

NOW, on motion of Michael Faillace and Associates, PC, the attorneys for the Plaintiffs, it is hereby ORDERED, ADJUDGED AND DECREED as follows:

That the Plaintiff, GERARDO FLORES, have judgment jointly and severally against the defendants KAI WON INC. (d/b/a KAR WON), JIAN WU and JOHNSTON WU in the amount

\$ of \$231,016.22, including compensatory damages and permissible liquidated damages and pre-judgment interest, all computed as provided in 28 U.S.C. § 1961(a).

That the Plaintiff, JAVIER CRUZ, have judgment jointly and severally against the defendants KAI WON INC. (d/b/a KAR WON), JIAN WU and JOHNSTON WU in the amount of \$231,574.27 including compensatory damages and permissible liquidated damages and pre-judgment interest, all computed as provided in 28 U.S.C. § 1961(a).

That the Plaintiff, GERARDO FLORES, have judgment jointly and severally against the defendants KAI WON INC. (d/b/a KAR WON), JIAN WU and JOHNSTON WU in the amount of \$ X, including compensatory damages and permissible liquidated damages and pre-judgment interest, all computed as provided in 28 U.S.C. § 1961(a).


\$ That the Plaintiff, HECTOR VERJEL, have judgment jointly and severally against the defendants KAI WON INC. (d/b/a KAR WON), JIAN WU and JOHNSTON WU in the amount of \$ 104,654.81, including compensatory damages and permissible liquidated damages and pre-judgment interest, all computed as provided in 28 U.S.C. § 1961(a).

\$ That the Plaintiff, ABRAHAM MATEO, have judgment jointly and severally against the defendants KAI WON INC. (d/b/a KAR WON), JIAN WU and JOHNSTON WU in the amount of \$ 110,618.53, including compensatory damages and permissible liquidated damages and pre-judgment interest, all computed as provided in 28 U.S.C. § 1961(a).

\$ That the Plaintiffs are awarded attorneys' fees ~~in the amount of \$~~ , and costs in the amount of \$ 13,861.50, all computed as provided in 28 U.S.C. § 1961(a).

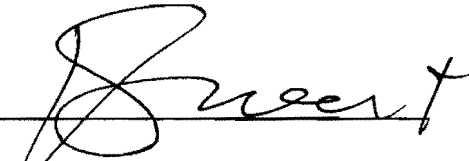
That if any amounts remain unpaid upon the expiration of ninety days following issuance of judgment, or ninety days after expiration of the time to appeal and no appeal is then pending,

whichever is later, the total amount of judgment shall automatically increase by fifteen percent,
as required by NYLL § 198(4)


U.S.D.J.

This document was entered on the docket on _____.

Dated: 8/23, 2013


U.S.D.J.

To:

KAI WON, INC. (d/b/a/ Kar Won)
116 East 60th Street
New York, New York 10022

JIAN WU
139 East 45th Street
New York, New York 10011

JOHNSTON WU
139 East 45th Street
New York, New York 10011